



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

April 4, 2024

**By ECF**

The Honorable Loretta A. Preska  
United States District Judge  
500 Pearl Street  
New York, NY 10007

**Re:** *United States v. Rafael Romero, 88 Cr. 642 (LAP)*

Dear Judge Preska:

The Government writes to request a second extension to respond to defendant Rafael Romero's motion seeking compassionate release pursuant to 18 U.S.C. § 3582(c) in the above-captioned matter, dated March 19, 2020, and supplemented by a memorandum of law by defense counsel Jill R. Shellow, Esq., dated February 14, 2022 (ECF Nos. 139 and 160) (the "Motion").

On April 4, 2024, the Court granted the Government's first extension request and ordered the Government to respond to the Motion by April 5, 2024 (ECF No. 297). As the Government informed the Court previously, the Government has been in the process of gathering and reviewing relevant case files, many of which are only available in physical form because this case was initially charged in 1988. The Government has not yet received these physical files. On April 3, 2024, the Government conferred with defense counsel who graciously agreed to provide the Government with any relevant files she has in her possession.

Accordingly, the Government respectfully requests an extension to Friday, May 17, 2024, to file the Government's response to the Motion. This extension will allow the Government time to obtain the relevant case files. The Government will endeavor to file its response to the Motion in advance of May 17, 2024, and will promptly send defense counsel the list of case files the Government seeks. Defense counsel has consented to this request.

On March 8, 2024, the Court granted the Government's first request for an extension of time. (Dkt. no. 297.) The Government's second request for an extension of time is hereby granted, and the Government shall submit its response by May 17, 2024. Defendant shall reply by June 21, 2024. SO ORDERED.

04/04/24

LORETTA A. PRESKA, U.S.D.J.

cc: Jill R. Shellow, Esq. (By ECF)

Respectfully submitted,  
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